

# **EXHIBIT 19**

**Advanced Care Staffing, LLC v. Benzor Vidal**

**Case No: 01-22-0002-9008**

---

**Arbitrator Order on Respondent's Request for a Stay**

On October 24, 2022, the undersigned Arbitrator requested supplemental submissions from the parties concerning Respondent's argument that the parties' arbitration agreement is unconscionable under New York Law.

Respondent provided a supplemental submission, dated November 10, 2022, and Claimant responded with a supplemental submission, dated November 20, 2022. Upon review of these and the parties' prior submissions concerning Respondent's Request for a Stay, Respondent's Request for a Stay is denied.

Neither Respondent's initial or supplemental submission provided sufficient factual or legal support for the argument that the arbitration agreement is unconscionable under New York law. Respondent's other arguments can be addressed during the proceedings in this matter.

**Arbitrator Order on Applicable Rules**

On November 22, 2022, the undersigned Arbitrator also requested comment from the parties concerning the AAA rules applicable to this matter. Based on those submissions and the facts related to the execution of the parties' Arbitration Agreement, the Arbitrator will apply AAA's Employment Arbitration Rules.

**Arbitrator Order on Emp. Arb. Rule 1**

On October 6, 2022, Respondent requested that the AAA implement a 60-day stay of this action, citing, among other things, Rule 1 of the Employment Arbitration Rules. Assuming that such request was timely made and had been granted by the AAA, the stay would have expired on December 5, 2022. Thus, the issue of a 60-day stay pursuant to Rule 1 is now moot.

**Updated Discovery Deadlines**

Unless the parties agree otherwise, the following updated discovery deadlines shall apply:

- Requests for documents and Interrogatories shall be served on or before December 9, 2022.
- Discovery responses shall be served on or before January 20, 2023.
- All discovery shall be completed by March 17, 2023.
- A status conference shall be held on February 10, 2023 at 10:00 a.m.

Dated this 9th<sup>nd</sup> Day of December, 2022

Sara Kula

---

Sara Kula, Arbitrator